

**IN THE UNITED STATES DISTRICT COURT FOR THE
MIDDLE DISTRICT OF ALABAMA
NORTHERN DIVISION**

UNITED STATES OF AMERICA)	
)	
v.)	Case No.: 2:06-cr-64-MHT
)	
MARQUISE ANTOINE REYNOLDS)	

MOTION TO MODIFY CONDITIONS OF SUPERVISION

COMES NOW the defendant, **MARQUISE ANTOINE REYNOLDS**, by Undersigned Counsel, Donnie W. Bethel, and moves this Court for an order modifying the conditions of Mr. Reynolds's supervision. In support of this motion, Mr. Reynolds states the following:

1. On November 15, 2006, this Court sentenced Mr. Reynolds to three years probation for the possession of marijuana. On February 21, 2008, this Court ordered that Mr. Reynolds' term of probation be modified and that Mr. Reynolds serve six months at Keeton Corrections, a community corrections facility in Spanish Fort, Alabama. The Court ordered Mr. Reynolds to report to Keeton on February 22, 2008, which he did.

2. Mr. Reynolds and United States Probation Officer (USPO) James Chappell agreed that if Mr. Reynolds successfully completed four months of community confinement, without incident, that Mr. Chappell would agree to recommend that Mr. Reynolds' term of community confinement be terminated at that point.

3. Mr. Reynolds' supervision has now been transferred to USPO John Meredith. On June 19, 2008, Undersigned Counsel discussed Mr. Reynolds' progress thus far with USPO Meredith. USPO Meredith reported that the latest progress report from Keeton

confirms that Mr. Reynolds has done well at Keeton and has complied with all the requirements of his community confinement. Mr. Reynolds will have completed four full months of community confinement as of June 21, 2008. Therefore, Mr. Reynolds now petitions this Court to terminate his community confinement immediately.

4. USPO Meredith supports Mr. Reynolds' Petition to have his community confinement terminated after four months.

WHEREFORE, Mr. Reynolds moves the Court to grant this Motion to Modify Conditions of Supervision.

Dated this 20th day of June, 2008.

Respectfully submitted

s/ Donnie W. Bethel
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CERTIFICATE OF SERVICE

I hereby certify that on June 20, 2008, I electronically filed the foregoing with the Clerk of Court using the CM/ECF system which will send notification of such filing to the following: A. Clark Morris, Esq., Assistant United States Attorney.

Respectfully submitted,

s/ Donnie W. Bethel
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